

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

2006 AUG 22 A 9:31

JAMES G. HUFFMAN
Full name and prison number
of plaintiff(s)

v.

Southern Health Services
Partners, Autauga County
Metro Jail, Sheriff Herbie
Johnson, Larry Nixon, Doc
tor Nicholson M.D.

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

CIVIL ACTION NO. 2:06CV748-MEF
(To be supplied by Clerk of
U.S. District Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES () NO (☒)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES (☒) NO ()
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) James G. Huffman

Defendant(s) Sheriff Herbie Johnson, Larry
Nixon, Autauga County Jail, et al

2. Court (if federal court, name the district; if state court, name the county) Circuit Court of
Autauga County, Alabama

3. Docket number UNKNOWN
4. Name of judge to whom case was assigned UNKNOWN
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) I have not received any confirmation that Writ of Habeas Corpus has even been received.
6. Approximate date of filing lawsuit July 5, 2006
7. Approximate date of disposition pending

II. PLACE OF PRESENT CONFINEMENT Autauga County Metro Jail 136 North Court Street, Prattville, 36067

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Autauga County Metro Jail 136 North Court Street Prattville, AL 36067

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- | NAME | ADDRESS |
|--|---|
| * 1. <u>Southern Health Partners</u> | <u>136 North Court Street, Prattville, AL 36067</u> |
| * 2. <u>President + Board of Directors of Southern Health Partners</u> | <u>136 North Court Street, Prattville, AL 36067</u> |
| 3. <u>Nurses of Southern Health Partners</u> | <u>136 North Ct. St. Prattville, AL 36067</u> |
| 4. <u>Sheriff Herbie Johnson</u> | <u>136 North Court St. Prattville, AL 36067</u> |
| 5. <u>Larry Nixon [LT.]</u> | <u>136 North Court Street Prattville, AL 36067</u> |
| 6. <u>Autauga County Metro Jail</u> | <u>136 North Court St. Prattville, AL 36067</u> |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED Started on ~~September 13, 2005~~ September 13, 2005

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: I am a heart patient with severe blockages in arteries of heart, abdominal artery, and carotid arteries, being denied my Plavix 75 mg. for blockage clearance, and my nitro tablets for pressure and pain in chest, I am also being denied my medication for my anxiety medication: i.e., Xanax 2mg, as well as my pain medication for the severe pain in my lower back; i.e., Percocet 10/650, where I had ~~se~~ surgery.

Continued From page 2

- * 1. I have requested the Corporate address in Tennessee for the Southern Health Partners by ascertaining of the employees of this medical Contractor via, both oral requests, and written requests to the jail's Medical Contractor. All requests have been denied.
- 2. I have also requested the name, and address of the President, and Board of Directors of Southern Health Partners in writing, but these inquiries have been denied.
- 3. I have attempted to get the first, and last names of the nurses employed by Southern Health Services here at the Autauga County Metro Jail, but those inquiries have also been denied.

Additional Respondents

- 7. Doctor Nichols, M.D. (Physician for Autauga County Metro Jail) 136 North Court Street, Prattville, AL 36067

In an attempt to clarify the violations of my civil rights, as well as my Constitutional rights by the Respondants, I feel it necessary to bring these facts into light for the Honorable Court's reading.

I was brought into the custody of the Autauga County Metro Jail from Birmingham, Alabama (where I had been hospitalized on several occasions due to heart problems) by a bounty hunter who had arrested me on a warrant for failure to appear on my designated Court date of August 31, 2005, in Circuit Court of Autauga County, Alabama.

I brought all my prescription medications with me from Birmingham where I had been involved in the ongoing medical treatment for heart problems, pain management, and depression problems associated with severe pain, and heart problems.

I was booked into the Autauga County Jail on September 13, 2005, and all my medications were given to the officers booking me into custody. The bounty hunter made these administrators aware of my health problems, and what medications I was given. I was denied any of my medications. I continually made requests to be given my medications but was denied them all. I was allowed to see the Doctor for the Jail 2 weeks after my booking and he refused to continue my medications. I was told that I could not receive my Plavix 75mg. or my Zocor 40mg. because they were too expensive for the Medical Contractor to fill. I suffered through severe chest pain, withdrawal, and extremely severe back pain due to the refusal to allow me to take my medications.

On February 6th I was transferred to Chilton County Jail for litigation of cases in that jurisdiction. All charges were dismissed on April 17, 2006. Then I was released to the Alabaster Police Department on that same date. I had a heart attack while in custody there on April 22nd 2006 and rushed to the Shelby Baptist Hospital where I was admitted and had to undergo surgery on my heart. The cardiologist determined that due to the fact that I had not been taking my Plavix 75mg. that my stents and my arteries had developed more clots.

He also determined that the severe stress I had and was experiencing due to the extreme anxiety, as well as severe pain I was having to deal with attributed to my heart attack.

I was discharged on April 27, 2006 with all my prescriptions ordered resumed for heart, anxiety and pain.

I turned myself in to the Autauga County Jail on April 29th, 2006, and gave them all my prescribed medication that the cardiologist had prescribed me ~~off~~ on my release from the Shelby Baptist Hospital.

The Southern Health Partners refused to give me the medications once again which resulted in a heart problem occurring where I had to be rushed to Prattville Baptist Medical Hospital where it was determined by the E.R. physician that due to having not been given my prescribed medications I had developed problems. This physician gave me Plavix, Nitro, Xanax 2mg, and Percocet 10/650 while I was under his care and made an order for the Southern Health Partners to continue these medications.

The Southern Health Partners refused to fill these prescriptions. I feel I have been denied my right to medical treatment, my civil rights to proper treatment and that I am being forced cruel and unusual punishment by the Respondent's.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

I was brought into custody here on September 13, 2005 after several hospitalizations in Birmingham, Alabama for severe heart problems. I had been prescribed Plavix 75mg., Zocor 40mg. and Nitro tabs. All these medications were refused me.

GROUND TWO: Denial of anxiety medication by Respondants

SUPPORTING FACTS: Upon my booking into the Autauga County Jail I was denied my prescription medication for anxiety medication; i.e., Xanax 2mg. by the staff of the Autauga County Metro Jail, even though I had my prescription medications with me.

GROUND THREE: Denial of my ~~an~~ pain medication; i.e., Percocet 10/650mg.

SUPPORTING FACTS: Upon my booking into the Autauga County Jail I was denied my prescription medication for pain due to a back problem; i.e. Percocet 10/650 even though I ~~was~~ had my prescription medications with me!

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I would like the Honorable Court to order the
Respondants to fill my prescriptions as well
as to punish them for punitive, cumulative, and
monetary damages.

James G. Huffman
signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on August 17, 2006.
(Date)

James G. Huffman
signature of plaintiff(s)